

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CORINNE KAPSER</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 22 cv 03563
	)	
<b>LUIS LAURENZANA, TODD</b>	)	Judge Martha M. Pacold
<b>WITULSKI, and CITY OF CHICAGO,</b>	)	
	)	Magistrate Judge Jeffrey T. Gilbert
Defendants.	)	

**THE PARTIES' JOINT MOTION FOR ENTRY OF  
AGREED CONFIDENTIALITY PROTECTIVE ORDER**

NOW COME Defendants, LUIS LAURENZANA, TODD WITULSKI, and CITY OF CHICAGO, by and through their attorneys, BORKAN & SCAHILL, LTD, and Plaintiff, CORINNE KASPER, by and through her attorneys, PEOPLE'S LAW OFFICE, and for their Joint Motion for Entry of Agreed Confidentiality Protective Order, state as follows:

1. This case stems from one of the protests that occurred in the City of Chicago during the summer of 2020. The attorneys for both Plaintiff and Defendants also represent parties in *Wilger, et al. v. City of Chicago, et al.*, 20-cv-06851 which is also referred to this Court. In *Wilger*, this Court resolved the dispute over the proposed protective order. *See* 20-cv-06851, Dkts. 94, 97, 99, 100 & 102.
2. The Parties have reached an agreement and seek to enter the protective order that was entered in *Wilger*. 20-cv-06851, Dkt. 97-3 (for a redline version), Dkt. 102.
3. The Parties' proposed changes to the model order are made in anticipation of the types of documents that may be sought in this case involving the Defendant Officers and Defendant City of Chicago's employees.
4. The Parties' will submit the proposed order to the Court's email pursuant to this Court's Standing Order.

WHEREFORE, for the foregoing reasons, the Parties respectfully request this Court to enter the agreed upon protective order and for any other such relief which this Court deems proper.

Respectfully submitted,

/s/ Christiane E. Murray

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